IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CHELSEY GOSSE, on her own behalf and on behalf of other persons similarly situated,) Case No. 3:20-cv-01446-RDM
Plaintiff,) Hon. Robert D. Mariani
v.) Electronically Filed
TRANSWORLD SYSTEMS, INC.; U.S. BANK, NA.; RATCHFORD LAW GROUP, P.C.; NATIONAL COLLEGIATE STUDENT LOAN TRUST 2007-3,)))

Defendants.

CONSENT MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF CHELSEY GOSSE'S COMPLAINT

Defendants U.S. Bank, N.A. ("U.S. Bank") and Transworld Systems, Inc. ("TSI") respectfully move the Court to extend the time for U.S. Bank and TSI to answer, move, or otherwise respond to Plaintiff's Complaint (the "Motion"). In support of the Motion, the aforementioned Defendants state as follows:

- 1. Defendants U.S. Bank and TSI's responses to Plaintiff's Complaint (Dkt.
 - 1) are currently due on Monday, September 14, 2020. (Dkt. 4, 5).
- To further investigate and best respond to Plaintiff's Complaint,
 Defendants U.S. Bank and TSI respectfully request an extension of time to

answer, move, or otherwise respond to Plaintiff's Complaint until October 26, 2020.

- 3. Defendants U.S. Bank and TSI met and conferred with Plaintiff on September 9, 2020, and Plaintiff consents to the relief requested herein.
- 4. No other extensions of time have been sought by either U.S. Bank or TSI in this matter.
- A proposed Order accompanies this Motion, as required by Local Rule
 1(g).

Dated: September 11, 2020 Respectfully submitted,

/s/ DRAFT

Kelly M. Locher (Pa. 322400) JONES DAY 500 Grant Street, Suite 4500 Pittsburgh, PA 15219 Phone: (412) 394-7937

Fax: (412) 394-7959

Email: klocher@jonesday.com

Counsel for Defendant U.S. Bank, N.A.

/s/ Aaron R. Easley, Esq.

Aaron R. Easley, Esq. (Pa. 73683) SESSIONS, FISHMAN, NATHAN & ISRAEL

3 Cross Creek Drive

Flemington, NJ 08822-4938

Phone: (908) 237-1660

Fax: (877) 334-0661

Email: aeasley@sessions.legal

Counsel for Defendant Transworld Systems, Inc.

/s/ Robert P. Cocco

Robert P. Cocco (Pa. 61907) ROBERT P. COCCO, P.C. 1500 Walnut Street, Suite 900 Philadelphia, PA 19102

Phone: (215) 351-0200 Fax: (215) 261-6055

Email: bob.cocco@outlook.com

Counsel for Plaintiff Chelsey Gosse

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of September, 2020, I filed the foregoing with the Clerk of the United States District Court using the CM/ECF system, which will send notification electronically to all counsel of record.

/s/ Kelly M. Locher Kelly M. Locher

Counsel for Defendant U.S. Bank, N.A.